

CITY OF EL CAJON

COMMUNITY DEVELOPMENT

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MAY 1 8 2004

GILLESPIE FIELD

May 10, 2004

Gillespie Field Airport Administration Building 1960 Joe Crosson Drive El Cajon, CA 92020

Re: Airport Layout Plan (ALP)

Thank you for the opportunity to review the proposed ALP for Gillespie Field.

Some of my comments were first raised much earlier and decisions were made two or more years ago but I believe they must be reiterated.

First, it is disappointing that the role of the City of El Cajon, within whose jurisdiction virtually all of Gillespie Field resides, is not described. In fact, the City of El Cajon does have land use and building permit issuance authority over all of Gillespie Field that is in the El Cajon city limits. The ALP should be modified to reflect the City's role in the further development of Gillespie Field.

In addition, it is interesting that the City Council of the City of El Cajon is not afforded the opportunity to take public action on the ALP. Again, Gillespie Field is in the El Cajon city limits.

It is also hard to understand how the ALP was able to reach this point <u>without</u> any reference to the California Environmental Quality Act (CEQA) or the preparation of an environmental analysis.

Since the proposed ALP actually shows future buildings and their sizes, the ALP is more than just a set of policies. It is a document used to specify the usage of a property. As such, it should have been considered a "project" under CEQA, in my opinion. The ALP does not mention CEQA or why it's exempt.

In a related matter, as just mentioned, portions of the ALP are very specific. For example, the map of the ALP (Figure 2-1) shows specific hangar locations and tie-down spaces on the 70-acre Cajon Plaza (Brucker) site. Table 2-3 further

Gillespie Field Airport Admin. Bldg. Re: Airport Layout Plan (ALP) Page 2

describes the actions to be accomplished in each of the three development phases of the ALP over the next 20 years including the sizes of buildings to be constructed and when. The ALP does not indicate what happens if there is a need to modify the size or location of a building or its timing. Must the ALP be formally amended or can this be done administratively?

The ALP forecasts future needs based upon a "high growth" forecast even though the number of annual aircraft operations has <u>decreased</u> from 271,000 in 1980 to 187,750 in 2000 (this time period avoids any effects of the post-Sept. 11, 2001 flying restrictions). This is a reduction of over 30%. (See Table 3-5) The total number of aircraft based at Gillespie Field has only slightly increased from 702 to 774 or 10% during this same time period. (Table 3-4)

Even though the review of the available fixed-based facilities (hangars and tiedowns) indicates a limited number of currently available spaces, the justification for accepting the "high growth" scenario is largely unsubstantiated, in my opinion. On page 4-2 there is a statement that "due to a variety of factors mentioned in Chapter 3, it is anticipated that the market for general aviation aircraft will increase in the CMA" (Gillespie Field Competitive Market Area) but that doesn't justify the "high growth" scenario.

Since the East County area served by Gillespie Field is essentially built out (the SANDAG 2030 projections show El Cajon, La Mesa, Santee and the surrounding unincorporated areas growing by less than one percent per year over the next 25 years), where are these future pilots and planes going to come from? If there was only a 10% increase in the number of based aircraft at Gillespie Field from 1980-2000 while the population of the surrounding area increased by 1.1% per year (avg. growth over 20 years from 1980-2000) why would there be a greater increase in aircraft to 2025, with a slower rate of growth in the surrounding areas?

The reason for this discussion is that this ALP will result in a major reduction in anticipated jobs, especially with the loss of the Cajon Plaza / Brucker site to only airport-related uses. Using information in Appendix B, the "aviation leaseholds" at Gillespie Field generate 4.2 jobs / acre while the "non-aviation leaseholds" generate 12.9 jobs / acre or a three-fold increase. For the Cajon Plaza 70 acres, this is a difference between 294 potential jobs and 903 potential jobs! (Note: It is understood that the FAA is very unlikely to release these 70 acres to non-aviation uses but the consequences are significant.)

The format of the ALP is confusing. As previously described, actual hangar sizes and locations as well as tie-down spaces are shown on the 70-acre Cajon Plaza site but no land use at all is shown for the 41-acre site at the northwest corner of

Gillespie Field Airport Admin. Bldg. Re: Airport Layout Plan (ALP) Page 3

Weld Blvd. and Cuyamaca St. It would be much easier for the City to incorporate the ALP into the City's General Plan if the ALP used colors or words to indicate proposed land use categories rather than the shapes, sizes and locations of specific buildings. For example, the City's General Plan could say "airport-related uses" for the Cajon Plaza site but would not show actual buildings if that's how the ALP is approved.

The Airport Airspace Plan (Figure 7-5) is very difficult to understand and the scale is too large to be able to accurately locate a property on the drawing and determine if it would be subject to special height limits. The same is true of the Airport-Protection Zones (Figure 7-6), which do not provide streets or other landmarks for easy reference. The City does not use runway numbers to demarcate restrictions of this nature. This information would be much more useful if placed on a base map of Gillespie Field at a scale clear enough to be understood.

The noise contour information shown on Figure 15 in Appendix C (Noise Study) is also at a scale that is too large to easily apply to a specific property for the same reasons.

If a property owner or resident needs a determination on noise, crash hazards or building heights, we must be able to locate their property easily. These drawings will only allow a "best guess" in most cases, which is not very reliable or accurate.

Finally, there is no discussion in the ALP of access or traffic issues. While this would obviously be a part of any environmental analysis of the ALP, the current "breakdown" service level of the on- and off-ramps and bridge at Bradley and Route 67 warrant discussion and mitigation.

If you have any questions, please call me at (619) 441-1741.

CITY OF EL CAJON

James S. Giffin

Director of Community Development

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